

**BURSOR & FISHER, P.A.**

Neal Deckant (State Bar No. 322946)  
1990 North California Blvd., 9th Floor  
Walnut Creek, CA 94596  
Telephone: (925) 300-4455  
Facsimile: (925) 407-2700  
E-mail: ndeckant@bursor.com

**GEORGE FELDMAN MCDONALD, PLLC**

Lori G. Feldman (*pro hac vice*)  
Michael Liskow (State Bar No. 243899)  
200 Park Avenue, Suite 1700  
New York, New York 10166  
Telephone: (646) 354-6534  
E-mail: lfeldman@4-justice.com  
mliskow@4-justice.com  
e-service@4-justice.com

*Attorneys for Plaintiffs*

*Additional Attorneys on Signature Page*

**UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA**

IN RE META PIXEL TAX FILING CASES

Master File No. 5:22-cv-07557-PCP

This document relates to:

**PLAINTIFFS' OPPOSITION TO  
MOTION TO SHORTEN TIME**

All actions

Date: December 4, 2025  
Time: 10:00 a.m.  
Judge: Hon. P. Casey Pitts  
Date Action Filed: Dec. 1, 2022

1 Plaintiffs in the above captioned action (“Plaintiffs”) oppose the motion to shorten time  
2 (“Motion,” ECF No. 246) filed by movants Julio Armstrong, Chesley Bonnes, Samantha Brewster,  
3 Patricia Carlson, Cessley Cole, Leslie Dent, Lonnie Dunaway, Joanna Gasperson, Flor Gomez, Beth  
4 Howard, Jason Karras, Justin Leo, Joseph Lipuma, Alysha Ottrix, Krystal Smith, Denise Sturgeon,  
5 Angela Wardell, Rosa Wardlow, Rachel Wegleitner and Kristen Wilder (“Movants”).

6 Under Civil Local Rule 6-3(a)(3), a motion to shorten time should only be granted where the  
7 movant, among other things, “[i]dentifies the substantial harm or prejudice that would occur if the  
8 Court did not change the time.” *Id.* Movants do not meet this prerequisite. First, any time pressure  
9 Movants may face is of their own making. Movants contend that an expedited hearing is necessary  
10 in light of Movant Cessley Cole’s January 20, 2026 evidentiary hearing before the AAA, *see* Motion  
11 at 1, but Cole filed her demand for arbitration in April 2025, over seven months ago. *See* ECF No.  
12 245-2 at 2. Cole and the other Movants therefore had ample time to take action to obtain discovery  
13 prior to Cole’s January 20, 2026 hearing date.

14 Instead, Movants waited until October 29, 2025, to raise this issue with Plaintiffs. *See* Motion  
15 at 3. After receiving what they believed to be an unsatisfactory response from Plaintiffs (and no  
16 response at all from Meta), Movants demand that their Motion to Intervene (ECF No 244) be heard  
17 on December 4, 2025, a date Plaintiffs’ primary California-based attorney is unavailable due to a  
18 hearing in another matter. *See* concurrently-filed Declaration of Neal Deckant in Support of  
19 Plaintiffs’ Opposition to Motion to Shorten Time (“Deckant Declaration”), ¶ 3.

20 Movants’ advanced date is also in the thick of Plaintiffs’ Counsel’s preparations to file their  
21 reply in support of class certification, and oppositions to Meta’s Daubert motions, all due December  
22 15, 2025. *See* ECF No. 244 at 1; Deckant Declaration, ¶ 4. Plaintiffs are also currently scheduled to  
23 depose Meta’s experts on December 2, 2025, in Boston, and on December 8, 2025, in California. *See*  
24 Deckant Declaration, ¶ 4. Requiring Plaintiffs’ Counsel to prepare for and attend the hearing on  
25 December 4, 2025, will needlessly disrupt their work in support of the putative classes. *See id.*

26 Finally, Movants’ assertion that the Court must move quickly is belied by their statement that  
27 their “individual arbitration cases before AAA are in early stages.” ECF No. 245 at 5-6.  
28

1 As Movants have not sufficiently identified any substantial harm or prejudice *to Movants* that  
2 would occur if any hearing on the Motion to Intervene occurs in the normal course, the Motion should  
3 be denied. If the Court does grant the Motion, Plaintiffs join Movants' request that any hearing be  
4 held remotely, *see* Motion at 2, due to the unavailability on December 4, 2025 of counsel for  
5 Plaintiffs who are based in Northern California. *See* Deckant Declaration, ¶ 3.

6 For the reasons stated above, Plaintiffs respectfully ask the Court to deny the Motion.

7  
8 Dated: November 14, 2025

**BURSOR & FISHER, P.A.**

9 By: /s/ Neal Deckant  
10 Neal Deckant

11 Neal Deckant (State Bar No. 322946)  
12 1990 North California Blvd., 9th Floor  
13 Walnut Creek, CA 94596  
Telephone: (925) 300-4455  
Facsimile: (925) 407-2700

**GEORGE FELDMAN MCDONALD, PLLC**

14 Lori G. Feldman (*pro hac vice*)  
15 Michael Liskow (State Bar No. 243899)  
16 102 Half Moon Bay Drive  
Croton-on-Hudson, NY 10520  
17 Telephone: (917) 983-9321  
E-mail: lfeldman@4-justice.com  
18 mliskow@4-justice.com  
eservice@4-justice.com

**SMITH KRIVOSHEY, P.C.**

19 Joel D. Smith (State Bar No. 244902)  
20 867 Boylston Street, 5<sup>th</sup> Floor  
21 Boston, MA 02216  
22 Telephone: 617-377-7404  
Email: joel@skclassactions.com

**GEORGE FELDMAN MCDONALD, PLLC**

23 Rebecca A. Peterson (State Bar No. 241858)  
24 1650 West 82nd Street, Suite 880  
25 Bloomington, MN 55431  
26 Telephone: (612) 778-9595  
Facsimile: (888) 421-4173  
27 E-mail: rpeterson@4-Justice.com  
28

**LOCKRIDGE GRINDAL NAUEN P.L.L.P.**

Kate M. Baxter-Kauf (*pro hac vice*)  
100 Washington Avenue South, Suite 2200  
Minneapolis, MN 55401  
Telephone: (612) 339-6900  
Facsimile: (612) 339-0981  
E-mail: kmbaxter-kauf@locklaw.com

**THE HODA LAW FIRM, PLLC**

Marshal J. Hoda, Esq. (*pro hac vice*)  
12333 Sowden Road, Suite B  
Houston, TX 77080  
Telephone: (832) 848-0036  
Email: marshal@thehodalawfirm.com

**FOSTER YARBOROUGH PLLC**

Patrick Yarborough, Esq. (*pro hac vice*)  
917 Franklin Street, Suite 220  
Houston, TX 77002  
Telephone: (713) 331-5254  
Email: patrick@fosteryarborough.com

**EMERSON FIRM, PLLC**

John G. Emerson (*pro hac vice*)  
2500 Wilcrest, Suite 300  
Houston, TX 77042  
Telephone: (800) 551-8649  
Email: jemerson@emersonfirm.com

*Attorneys for Plaintiffs*